

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STEVEN J. BELL,

Plaintiff,

vs.

FEDERAL DEPOSIT INSURANCE
CORPORATION; TWIN CAPITAL
MORTGAGE, INC.; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC.; REGIONAL TRUSTEE SERVICES
CORPORATION; LENDER PROCESSING
SERVICES, INC.; and DOE DEFENDANTS
1 through 20, inclusive,

Defendants.

Case No. 2:09-cv-00150-RSL

**DECLARATION OF
CHRISTOPHER R. AMBROSE
IN SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL FOR
DEFENDANT TWIN CAPITAL
MORTGAGE, INC.
[LOCAL RULE GR 2(g)]**

I, Christopher R. Ambrose, hereby declare and state:

1. I am an attorney licenced to practice before the Courts of the State of Washington and before the Western District of Washington. I am a member of Ambrose Law Group LLC, attorneys of record for defendant Twin Capital Mortgage, Inc. ("Twin Capital"). I make this Declaration in support of the Motion of Christopher R. Ambrose and Ambrose Law Group LLC to withdraw as counsel for Twin Capital.

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2. The following information is true to the best of my knowledge, and if called upon as a witness, I would be competent to testify as to the truth of the matters discussed in this Declaration.

3. I have been advised that Twin Capital is an insolvent corporation and that it is in the process of dissolving.

4. A trial date is set for September 13, 2010. A discovery cutoff date has been set for May 16, 2010. A settlement conference is set for July 15, 2010. No postponement of the action appears necessary.

5. I certify that I have provided notice to Twin Capital and its corporate counsel of this Motion, and Twin Capital consents to this withdrawal.

6. I also certify that I have provided notice to Twin Capital and its corporate counsel that Twin Capital, as a corporation, "is required by law to be represented by an attorney admitted to practice before this court and that failure to obtain a replacement attorney by the date the withdrawal is effective may result in the dismissal of the corporation's claims for failure to prosecute and/or entry of default against the corporation as to any claims of other parties."

7. Ambrose Law Group LLC is prepared to deliver to Twin Capital, or its counsel, all papers and property to which Twin Capital is entitled, and to comply with any applicable laws and rules governing withdrawal of counsel under the present circumstances.

I declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 4th day of May, 2010.

/s/ Christopher R. Ambrose
Christopher R. Ambrose, WSBA 26237

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2010, I electronically filed the foregoing **DECLARATION OF CHRISTOPHER R. AMBROSE IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT TWIN CAPITAL MORTGAGE, INC.**, with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following:

Melissa A. Huelsman (huelsmanlaw@comcast.net)
Law Offices of Melissa A. Huelsman
705 Second Avenue, Suite 501
Seattle, Washington 98104
Attorney for Plaintiff

Douglas L. Davies (dougdavies@hotmail.com)
Davies Law Group
701 Fifth Avenue, Suite 4200
Seattle, Washington 98104
**Attorney for Defendants Federal Deposit Insurance Corporation
and Mortgage Electronic Registration Systems, Inc.**

Jennifer Tait (jtait@robinsontait.com)
Nicolas A. Daluiso (ndaluiso@robinsontait.com)
Robinson Tait, P.S.
710 Second Avenue, Suite 710
Seattle, Washington 98104
Attorneys for Defendant Regional Trustee Services Corporation

I further certify that on May 4, 2010, said document was served on the following recipient, by placing a true copy in a postage prepaid envelope addressed to said recipient at the address indicated below, and depositing the envelope in the mails of the United States Postal Service at Portland, Oregon:

Twin Capital Mortgage, Inc.
Attention: Darius Mirshahzadeh, President
650 Townsend Street, Suite 225
San Francisco, CA 94103

DATED this 4th day of May, 2010.

AMBROSE LAW GROUP LLC

/s/ Christopher R. Ambrose
Christopher R. Ambrose, WSBA No. 26237
Attorneys for Defendant Twin Capital Mortgage, Inc.

CERTIFICATE OF SERVICE

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